

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

James McAfee

Case No. 24-30260

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 5, 2024 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

Code Section
18 U.S.C. § 922(g)(1)

Offense Description
Felon in Possession of a Firearm

This criminal complaint is based on these facts:
See attached affidavit.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: July 9, 2024

City and state: Detroit, MI



Complainant's signature

Ali Bilal, Task Force Officer, ATF
Printed name and title



Judge's signature

Hon. Elizabeth A. Stafford, United States Magistrate Judge
Printed name and title

AFFIDAVIT IN SUPPORT OF
A CRIMINAL COMPLAINT

I, Task Force Officer Ali Bilal, being duly sworn, hereby state:

INTRODUCTION AND AGENT BACKGROUND

1. I have been employed as a Task Force Officer with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) since March 2023. I am currently assigned to Detroit Group II, investigating various federal firearm violations. I have been employed with the Detroit Police Department since September 2016. As an officer with the Detroit Police Department, I have been assigned to the patrol division, the Ninth Precinct Special Operations Unit, Ninth Precinct Detective Unit, and the Firearms Investigative Team. During my law enforcement career, I have conducted and participated in numerous criminal investigations, including crimes of violence, and firearm violations. Specifically, I have also investigated violations of Title 18, United States Code, Section 922(g)(1), possession of a firearm by a convicted felon.
2. I make this affidavit from my personal knowledge based on my participation in this investigation, communications with other who have personal knowledge of the events and circumstances described herein, review of reports by myself and/or other law enforcement agents, and information gained through my training and experience. The information

outlined below is provided for the limited purpose of establishing probable cause and does not include all the information known to law enforcement related to this investigation.

3. This affidavit provides information necessary to establish probable cause that James MCAFEE (DOB: XX/XX/1992) has violated Title 18, United States Code, Section 922(g)(1), possession of a firearm by a convicted felon.

PROBABLE CAUSE

4. I reviewed a computerized criminal history and Michigan Department of Corrections records for MCAFEE, which revealed the following felony arrest and conviction.

- a. On October 27, 2016, MCAFEE was charged with two counts of armed robbery in Oakland County's Sixth Circuit Court. On February 8, 2017, MCAFEE pled guilty as charged. MCAFEE was sentenced to 6 years to 30 years of incarceration. On December 6, 2022, MCAFEE was paroled from the Michigan Department of Corrections.
- b. Because MCAFEE was sentenced to 6 to 30 years of incarceration, I believe MCAFEE knew that he had previously been convicted of a crime punishable by more than one year of incarceration.

5. On July 5, 2024, at approximately 10: 20 p.m., Detroit Police Officers were conducting a Green Light Partner special attention at a Gas Station located at 10601 E. Outer Drive in Detroit, Michigan. Police officers saw MCAFEE fueling a silver SUV.
6. As MCAFEE was fueling the SUV, the right side of his body was facing the officers. Officers were able to see the handle of a pistol protruding from MCAFEE's right short pocket. The rest of the pistol was concealed inside of MCAFEE's right short pocket.
7. Officers approached MCAFEE and asked him if he had a concealed pistol license (CPL). MCAFEE told officers the pistol belonged to his wife. As officers were attempting to obtain information on whether MCAFEE was a valid concealed pistol licenses holder, his hands began moving near the firearm. MCAFEE was placed in handcuffs and officers recovered a black Ruger Security 9mm pistol from his pocket. The pistol was loaded with a magazine containing ten live 9mm rounds. Officers conducted a Law Enforcement Information Network (LEIN) query to check if MCAFEE was a CPL holder, he was not. MCAFEE was placed in-custody and transported to the Detroit Detention Center.
8. On July 5, 2024, I contacted ATF Interstate Nexus Expert, Special Agent Kara Klupacs and provided a verbal description of Ruger Security 9mm, serial number 384-20033, recovered by Detroit Police Officers on July 4,

2024. SA Klupacs advised the firearm was manufactured outside of the State of Michigan, and therefore has traveled in and affected interstate commerce.

CONCLUSION

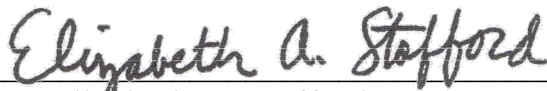
9. Based upon the aforementioned facts, there is probable cause to believe James MCAFEE (B/M, DOB: XX/XX/1992) did knowingly and intentionally possess a Ruger Security 9mm, said firearm having affected interstate commerce, in violation of Title 18, United States Code, Section 922(g)(1). Said violation occurring on July 4, 2024, in the City of Detroit, in the County of Wayne, in the Eastern Judicial District of Michigan.

Respectfully Submitted,



Ali Bilal, Task Force Officer
Bureau of Alcohol, Tobacco,
Firearms and Explosives

Sworn to before me and signed in my presence and/or by reliable electronic means.



Hon. Elizabeth A. Stafford
United States Magistrate Judge

Date: July 9, 2024